



IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

| | | |
|-----------------------------------|---|--------------------------------|
| AMERICAN NATIONAL PROPERTY AND |) | |
| CASUALTY COMPANY, |) | |
| |) | Civil Action No. 3:08-cv-00604 |
| Plaintiff, |) | |
| |) | Judge Trauger |
| v. |) | Magistrate Judge Bryant |
| |) | |
| CAMPBELL INSURANCE, INC., et al., |) | JURY DEMAND |
| |) | |
| Defendants. |) | |

MOTION TO EXCEED PAGE LIMIT

The plaintiff, American National Property and Casualty Company (“American National”), pursuant to LR 7.01(e)(1), respectfully moves for permission to exceed the page limit of 25 pages with respect to its Response to Campbell Defendants’ Motion for Summary Judgment, which is filed herewith. As grounds for this motion, American National states that it would be impossible to give proper treatment to the involved facts of this case (given American National’s burden to “put up or shut up,” Street v. J.C. Bradford & Co., 886 F.2d 1472, 1478 (6th Cir. 1989), with respect to at least some of the claims) and then analyze the numerous legal questions presented within 25 pages. This is particularly true since the Court, in its Memorandum (Docket No. 99) explaining its reasons for granting American National a preliminary injunction requiring the Campbell Defendants to return American National’s “Business” information, specifically noted that American National would need to provide more factual detail before the Court could properly analyze its claim for a violation of the Tennessee Uniform Trade Secrets Act. American National’s Response provides the appropriate level of detail regarding American National’s protection of its confidential “Business” information, sets